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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF DEFENDANTS
UBER TECHNOLOGIES, INC., RASIER,
LLC, AND RASIER-CA, LLC'S MOTION
TO EXCLUDE OPINIONS OF PLAINTIFFS'
EXPERT DR. JOHN CHANDLER**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

Judge: Mag. Lisa J. Cisneros
Courtroom: G – 15th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of California
3 and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber
4 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”) in this action. I have personal
5 knowledge of each and all of the facts stated in this declaration and, if called as a witness, could and would
6 competently testify to the facts contained herein.

7 2. Attached as **Exhibit 1** is a true and correct copy of the September 26, 2025 Report of John
8 Chandler, Ph.D.

9 3. Attached as **Exhibit 2** is a true and correct copy of the November 6, 2025 Deposition of
10 Transcript of John Chandler, Ph.D.

11 4. Attached as **Exhibit 3** is a true and correct copy of the September 26, 2025 Expert Report
12 of Victoria Stodden, Ph.D.

13 5. Attached as **Exhibit 4** is a true and correct copy of the October 24, 2025 Rebuttal Report
14 of John Chandler, Ph.D.

15 6. Attached as **Exhibit 5** is a true and correct copy of the August 29, 2025 JCCP Order on
16 Parties’ Motions in Limine and Motions to Exclude Expert Opinions.

17 7. Attached as **Exhibit 6** is a true and correct copy of the November 7, 2025 Deposition of
18 Transcript of John Chandler, Ph.D.

19 8. Attached as **Exhibit 7** is a true and correct copy of the October 24, 2025 Expert Rebuttal
20 Report of Victoria Stodden, Ph.D.

21 9. Attached as **Exhibit 8** is a true and correct copy of the Uber Incident Report Classification
22 of Dominant Tickets for 2017–2024 (Flack Data).

23 10. Attached as **Exhibit 9** is a true and correct copy of Casey Bradshaw & David M. Blei, *A*
24 *Bayesian Model of Underreporting for Sexual Assault on College Campuses*, 18 The Annals of Applied
25 Statistics 3146 (2024).

26 I declare under penalty of perjury under the laws of the United States and the State of California
27 that the foregoing is true and correct.

Executed on November 10, 2025, in San Francisco, California.

/s/ Laura Vartain Horn

Laura Vartain Horn

E-FILING ATTESTATION

I, Laura Vartain Horn, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Laura Vartain Horn

Laura Vartain Horn

EXHIBIT 1

FILED UNDER SEAL

EXHIBIT 2

FILED UNDER SEAL

EXHIBIT 3

FILED UNDER SEAL

EXHIBIT 4

FILED UNDER SEAL

EXHIBIT 5

FILED UNDER SEAL

EXHIBIT 6

FILED UNDER SEAL

EXHIBIT 7

FILED UNDER SEAL

EXHIBIT 8

FILED UNDER SEAL

EXHIBIT 9

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